

Exhibit 4

(Elle Magazine Article)

Home Culture Celebrity

JANUARY 3, 2025

Every Explosive Detail From Blake Lively's Lawsuit Against Justin Baldoni

Blake Lively details her issues on the 'It Ends With Us' set



Rebecca Mitchell



PRINT



On December 20, Blal
and director, Justin Ba
harassment and the all



and turn
heads



LE

Impo

made headlines around the world, was only a ‘precursor to a lawsuit’, Lively has now officially filed a formal suit. Filed in the New York Federal court against Baldoni, Wayfarer and his publicists, Lively alleges sexual harassment, retaliation, breach of contract, infliction of emotional distress, invasion of privacy and lost wages.

ADVERTISEMENT

“Wayfarer and its associates have violated federal and California state law by retaliating against her for reporting sexual harassment and workplace safety concerns,” Lively’s team said in a statement. “Now, the defendants will answer for their conduct in federal court. Ms. Lively has brought this litigation in New York, where much of the relevant activities described in the Complaint took place, but we reserve the right to pursue further action in other venues and jurisdictions as appropriate under the law.” The lawsuit formalises the allegations made in the complaint.

Meanwhile, Baldoni has sued the New York Times for libel, for its coverage of Lively’s initial legal complaint, specifically its exposé on the social media tactics allegedly deployed by Baldoni and his team, which Baldoni denies.

For those catching up, here’s a summary of Blake Lively’s legal complaint and its allegations.

Who Is Blake Lively’s Lawsuit Against?

ABC News reports Lively’s formal lawsuit, filed on December 31 with the New York Federal Court, is a formalising of her legal complaint, filed on December 20. The legal complaint named the following defendants:

ADVERTISEMENT



Who Made The
Guest List For
Taylor Swift's...



Blake Lively And
Ryan Reynolds
Just Revealed...

- Wayfarer Studios (the production company owned by Justin Baldoni)
- Justin Baldoni (actor, director, producer)
- Jamey Heath (the CEO of Wayfarer Studios and lead producer on *It Ends With Us*)
- Steve Sarowitz (co-owns Wayfarer Studios with Baldoni)
- Melissa Nathan (publicist, crisis PR expert)
- The Agency Group (Melissa Nathan's agency)
- Jennifer Abel (Baldoni's publicist)
- RWA Communications (Jennifer Abel's agency)
- Jed Wallace (publicist)
- Street Relations Inc (Jed Wallace's agency), and
- 1-100 'Does' (a legal term describing a range of anonymous people, e.g. Jane or John Does, possibly involved in the case)

All have denied the allegations, with Baldoni and Wayfarer's legal reps calling them "categorically false". (Read statements below)

A Summary Of Allegations

Per the [legal complaint](#), Lively is seeking damages for sexual harassment, retaliation, failure to investigate, prevent or remedy harassment, aiding and abetting harassment and retaliation, breach of contract, intentional infliction of emotional distress, negligence, false light invasion of privacy, and interference with prospective economic advantage.

The Wildest Claims From Blake Lively's Legal Complaint

The 81-page legal filing contains explosive allegations, and includes documents and text messages as alleged evidence of Lively's claims.

Allegations I

The lawsuit starts by detailing a meeting held between Lively, Baldoni and others who worked on *It Ends With Us*. The ‘all hands’ meeting was held to address complaints reportedly made by Lively. Per her contract she brought a representative—her husband, **Ryan Reynolds**. The meeting reportedly discussed 30 issues raised by Lively and her team, including being shown images of naked women (specifically, a video of Jamey Heath’s wife giving birth), non-consensual discussions of her weight, and Mr Baldoni allegedly “speaking to” Lively’s dead father. Among the complaints were some that led to Lively requesting that an intimacy coordinator being present on set during scenes between her and Baldoni, no more improvised kissing, and that Mr Baldoni and Mr Heath not touch Lively, her employees or other female crew members without their consent.



A photo of Blake Lively and Justin Baldoni on the set of *It Ends With Us*. Image: Getty (Credit: Getty)

Per Lively's legal filing, the team allegedly discussed and reached an agreement on a variety of points, including the following:

- No more showing n
and/or her employee

- No more mention of Mr Baldoni's or Mr Heath's previous "pornography addiction" or BL's lack of pornography consumption to BL or to other crew members.
 - No more mention to BL or her employees of personal times that physical consent was not given in sexual acts, as either the abuser or the abused.
1. No more descriptions of their own genitalia to BL.
 2. No more inquiries by Mr Baldoni to BL trainer without her knowledge or consent to disclose her weight.
 3. No more mention by Mr Baldoni of him "speaking to" BL's dead father.
 4. If BL and/or her infant is exposed to COVID again, BL must be provided with immediate notice as soon as Wayfarer or any other producers become aware of such exposure, without her needing to uncover days later herself.
 5. No more pressing by Mr Baldoni to save any of BL's employees
 6. No more adding of sex scenes, oral sex, or on camera climaxing by BL outside the scope of the script BL approved when signing onto the project.
 7. No more asking or pressuring BL to cross physical picket lines

See the full list in the [legal complaint](#).

Meanwhile, Baldoni's lawsuit against the *New York Times* alleges that in a meeting, Reynolds "berated" him for allegedly 'fat-shaming' Lively, and described the encounter as "traumatic".

ADVERTISEMENT

That Justin Baldoni and His Team Were Allegedly Out To "Destroy" Blake Lively's Reputation

Much of the lawsuit centres on a concentrated effort to allegedly harm Blake Lively's image, including several strategies allegedly used as a means to this end. In one example, the legal document says Baldoni's focus on domestic violence during the *It Ends With Us* press tour, was a publicity stunt intended to "protect hi
funded by billionaire S

“What the public also did not know was that this was the beginning of a multi-tiered plan that Mr. Baldoni and his team described as “social manipulation” designed to “destroy” Ms. Lively’s reputation,” the case alleges. “That plan was backed by virtually unlimited resources. Wayfarer’s co-founder, co-chairman and leading financier is multi-billionaire Steve Sarowitz, who divulged at the Film’s New York premiere on August 6, 2024, that he was prepared to spend \$100 million to ruin the lives of Ms. Lively and her family. With that backing, Mr. Baldoni and his Wayfarer associates embarked on a sophisticated press and digital plan in retaliation for Ms. Lively exercising her legally-protected right to speak up about their misconduct on the set, with the additional objective of intimidating her and anyone else from revealing in public what actually occurred.”

Those involved have denied these allegations.

The Subpoenaed Text Messages

The legal complaint contains details of alleged strategies employed by Baldoni and his team of publicists, crisis managers and PR strategists, including Jennifer Abel, Jed Wallace and Melissa Nathan, to allegedly “destroy” the reputation of Lively and her family.

ADVERTISEMENT



Who Made The
Guest List For
Taylor Swift’s...



Blake Lively And
Ryan Reynolds
Just Revealed...

A string of text message procured by Lively’s legal team through subpoena, include claims allegedly made by Nathan that she could “bury anyone”. The texts from Baldoni include one shared link to an article that accused another female celebrity of bullying women. Baldoni allegedly wrote, “this is what we would need.”

Other claims include t

“Is Blake Lively set to l

success of the campaign, with Abel allegedly writing to Nathan, “You really outdid yourself with this piece”, and Nathan responding, “That’s why you hired me, right? I’m the best.”

Baldoni’s legal team have called the correspondence in the legal complaint “cherry-picked”, and that it was “standard” among PR professionals. Although these are not all the text messages exchanged between Baldoni and/or his team, here is a sample below. In Baldoni’s lawsuit against the *New York Times*, he and his team formalise their claims the published texts were cherry picked, adding that one key example left out a key text. In an exchange in which Jennifer Abel praised Melissa Nathan for a story depicting Blake Lively in a negative light, Baldoni claims *The Times* left out a key message. “You really outdid yourself with this piece,” Abel allegedly wrote. “That’s why you hired me right? I’m the best,” Nathan replied. However, the new lawsuit filed against the NYT says the publication left out a key text from Nathan, which read: “Damn this is unfair because it’s also not me.”

From: Jennifer Abel (owner)
To: Melissa Nathan

You can of course do that but I do think he needs to know. I'm going to confidentially send you something he's texting me and Jamey on the side just to arm you before this call. I think you guys need to be tough and show the strength of what you guys can do in these scenarios. He wants to feel like she can be buried...

Priority: Normal

02/08/2024 13:47:25(UTC+0)

From: Melissa Nathan
To: Jennifer Abel (owner)

We can't write it down to him
We can't write we will destroy her. We will go to this. We will do this. We will do this. We will do this.

Priority: Normal

02/08/2024 13:48:24(UTC+0)

From: Melissa Nathan
To: Jennifer Abel (owner)

He has to look at it as an information document for us to be armed with
That's all . Imagine if a document saying all the things that he wants ends up in the wrong hands.

Priority: Normal

02/08/2024 13:49:03(UTC+0)

How Did Justin Baldoni Respond To Lively's Lawsuit?

Those named as defendants in the legal complaint have denied the allegations, with lawyer Bryan Freedman supplying a statement to the *New York Times* on behalf of Baldoni and the other accused. The statement calls the allegations “categorically false”, and “another desperate attempt [by Lively] to fix her negative reputation.”

“It is shameful that Ms. Lively and her representatives would make such serious and categorically false accusations against Mr. Baldoni , Wayfarer Studios and its representatives, as yet another desperate attempt to ‘fix’ her negative reputation which was garnered from her own remarks and actions during the campaign for the film; interviews and press activities that were observed publicly, in real time and unedited, which allowed for the internet to generate their own views and opinions,” the statement begins. “These claims are completely false, outrageous and intentionally salacious with an intent to publicly hurt and rehash a narrative in the media.”

The statement claims that Wayfarer Studios made the decision to engage a crisis manager in response to “the multiple demands and threats made by Ms. Lively during production which included her threatening to not showing up to set, threatening to not promote the film, ultimately leading to its demise during release, if her demands were not met.” The statement also alleges Lively engaged her own PR team to “plant negative and completely fabricated and false stories with media”.

“What is pointedly missing from the cherry-picked correspondence is the evidence that there were no proactive measures taken with media or otherwise; just internal scenario planning and private correspondence to strategize which is standard operating procedure with public relations professionals.” Read the full statement [here](#).



Who Made The
Guest List For
Taylor Swift's...



Blake Lively And
Ryan Reynolds
Just Revealed...

Freedman also revealed Baldoni and team's intent to file their own lawsuits. The lawyer stated it wasn't a matter of if, but when and "how many" lawsuits would be filed. "I am not going to speak to when or how many lawsuits we are filing but when we file our first lawsuit, it is going to shock everyone who has been manipulated into believing a demonstrably false narrative," Freedman, told ***Deadline*** on December 28. "It will be supported by real evidence and tell the true story. In over 30 years of practising, I have never seen this level of unethical behaviour intentionally fuelled through media manipulation."

On December 31, Baldoni further responded to Lively's lawsuit by **suing the New York Times** for libel.



Rebecca Mitchell

Senior Writer

Rebecca Mitchell graduated from Charles Sturt University in 2011, with solid media experience already under her belt. She started her career in broadcast news, simultaneously hosting the *Never Talk Politics* radio programme on 2MCE and as a reporter at *WIN News* and after returning to her hometown of Sydney, she worked as a journalist in lifestyle media, including at *Mamamia*, *SheSaid*, and Foxtel's Lifestyle group. Formerly a freelance journalist, you can find her words at *Refinery29*, *Urban List*, *Broadsheet*, but she now resides as the Senior Writer for *ELLE Australia*, specialising in all things culture and lifestyle-related.

Related



Who Made The Guest List
For Taylor Swift's Birthday
Party For Blake Lively?



Blake Lively And
Reynolds Just Reunited
Their Fourth Baby

All The Looks You Missed From The Grammys Red Carpet

Elle

All The Looks From The 2025 Golden Globes Red Carpet

Elle

Enlarged Prostate Has Nothing to Do with Age. Just Stop Doing This One Common Thing!

Health Benefits | Sponsored

Nvidia's New Rival (Hint: It's Not AMZN)

Motley Fool | Sponsored

This Mascara is Made With Older Women in Mind

Prime Lash | Sponsored

[Learn More](#)

MD: Building Muscle After 60 Comes Down To This 1 Thing

Apex Labs | Sponsored

The best wireless bra designed by a 70-year-old engineer for elderly women

Hatmeo | Sponsored

Plastic Surgeon Tells: If You Have Wrinkles, Do This Immediately (It's Genius!) The 1 Household Item That Visibly Tightens Saggy Skin

Beverly Hills MD | Sponsored

[Learn more](#)

Flight Attendant Reveals How To Fly Business Class For The Price of Economy

Online Shopping Tools | Sponsored

Who Actually Has the Cheapest Car Insurance in Texas (Check Zip Code)

Forbes | Sponsored

[Get Offer](#)

The Best Behind The Scenes Photos From The Golden Globes

Elle

The Story Behind Zendaya's Golden Globes Dresses

Elle

Amazon Is Losing Money as Shoppers Are Cancelling Prime For This Clever Hack

Online Shopping Tools | Sponsored

Enlarged Prostate Has Nothing To Do With Age: Just Stop Doing This One Common Thing!

EZ Pro | Sponsored

[Learn More](#)

Why Walgreens Hides This Cheap 87¢ Generic Cialis

Public Health Forum by Friday Plans | Sponsored

Seniors Born 1941-1979 Receive 7 Benefits This Month If They Ask

SeniorDealToday | Sponsored

Justin Baldoni Is Suin

Where To Watch 2025 Grammy Awards In Australia

Elle

ADVERTISEMENT

ELLE

FASHION

BEAUTY

LIFE

CULTURE

CELEBRITY

BRIDE

SHOPPING

DISCOUNT CODES



ABOUT

PRIVACY

TERMS

SUBSCRIBE

CONTACT

FASHION & BEAUTY

© 2025 Are Media Pty Ltd

Are Media acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past and present. All products are independently selected, tested or recommended by our team of experts. If you buy something, we may earn an affiliate commission. Are Media and its brands may have generated text partially using generative AI. Upon generating draft language, our editors review, edit, and revise it to their own liking. We take ultimate responsibility for the content of our publications.